

Response to EPA Comments of February 8, 2016 on Final Draft Local Limits Report

CWACS 2/9/16

1. Page 5, Section E. SIUs -Does the City permit 27 or 29 SIUs? Both facility counts are referenced in the first and third sentences, respectively.

Response: The City currently permits 29 SIUs. Two industrial users (Nitrex of Nevada and the College of Southern Nevada) status are currently being reviewed. Nitrex is a zero discharging facility. The College does not appear to meet the definition of an SIU.

- 1.a. This section indicates that the City permits six SIUs that discharge to the Clark County Water Reclamation District. If that is the case, then the multijurisdictional agreement between the City and Clark County needs to be clear who will take enforcement actions against these IUs if violations occur.

Response: The City is aware of the need for a Interlocal contract with the County and as a part of the AO issued by EPA is moving forward on that.

2. Page 6, Section F. Local Limits Process -No expansion or growth factor has been included in the local limits development. Does the City not expect new or increased discharges from SIUs in the future? It is mentioned in the ninth paragraph of Section C. Description of POTW that the North Las Vegas Water Reclamation Facility is designed to accommodate a future expansion of 25 MGD.

Response: The City does expect growth from industrial users within the City limits. However, the majority of the growth is anticipated to be in an industrial area that will be served by a separate wastewater treatment plant to be constructed. The City will also be re-evaluating some of the permitted flows given to existing SIUs. If industrial user growth and associated discharges increase significantly, the City will re-evaluate local limits for the existing POTW.

3. Page 9, Item 1-What local limits are you referring to that the City adopted? If you are referring to the local limits established by the City of Las Vegas pretreatment program that the City used when they discharged wastewater to the City of Las Vegas Water Pollution Control Facility, prior to building the North Las Vegas Water Reclamation Facility, then these

limits are irrelevant. Local limits are established specifically for the capabilities of a city's wastewater treatment plant and are not interchangeable between treatment plants.

Response: The City agrees. The discussion is meant to address the current, effective limits approved by EPA and there was no suggestion that the City was viewing the old and new local limits as “interchangeable”. However, the limits are relevant for any discharges from industrial users in the City’s jurisdiction that may go to the City of Las Vegas.

4. Page 9, Item 6 -EPA provided the following comment to the City's Preliminary Local Limits Report: "The City did not provide a summary of inhibition thresholds as required by the AO. The City has relied on the Guidance as the basis for failing to provide this data. Please bear in mind that the primary requirement that must be adhered to is the AO. The 2004 Local Limits Guidance should be used for Pretreatment Program requirements not specifically defined in the AO. Please provide the requested information." This submittal still does not provide the requested information.

Response: EPA is correct that the City needs to provide a discussion and table of inhibition values. This data was prepared but not submitted in response to EPA’s previous local limits comments. This information has been included in Attachment 2 of the local limits submittal.

5. Page 10, POC Table -The BOD design value was not provided in the Preliminary Local Limits Report. How was the BOD design flow of 82,566 lbs/day determined for this submission?

Response: The BOD design information has been updated. The POTW is in full compliance with all effluent limits. The annual average cBOD design is 62,500 lbs/day (annual average) that is equivalent to 75,000 lbs/day BOD. The maximum monthly cBOD design is 81,315 lbs/day that is equivalent to a BOD design of 97,578 lbs/day. The source of this information is from the Greeley and Hansen design document, Section 2 titled “Original Basis of Design”. The conversion factor of 1.2 was used to convert cBOD to BOD (from EPA Permit Writer’s Guidance and others). Using $62,500 \text{ lbs/day} \times 1.2 = 75,000 \text{ lbs/day}$. The current influent loading averages 50,240 lbs/day or 67% of the design based upon annual average data. Looking daily maximum data, the influent loading would be 70,741 lbs/day or 72% of the maximum monthly design data. The design data was not available as a daily maximum. Maximum monthly loading is thought to most closely represent the loading that a daily maximum local limit would be based upon. The City had established a surcharge limit in previous Ordinance and will evaluate surcharging in the future.

6. Page 12, POC Table -The average TSS load is compared to design maximum, however, the maximum load should be used in the comparison, which results in a maximum load of 60,635 lb/day or 68%. Please revise the table.

Response: The table was updated. The POTW is in full compliance with all effluent limits. The annual average TSS design is 68,805 lbs/day (annual average) and the maximum monthly TSS design is 89,445 lbs/day. The current influent loading averages 46,198 lbs/day or 67% of the design based upon annual average data. The maximum daily influent loading is estimated at 83,734 lbs/day or 94% of the maximum monthly design data if all conventional data is evaluated at the 80th percentile value (580 mg/L). If newer data is used, the Maximum daily loading is 60,635 lbs/day or 68% of the monthly maximum. The design data was not available as a daily maximum and as is typical with POTW influents, TSS influent data is widely variable. The City has not violated its NPDES permit for TSS. The City had established a surcharge limit in previous Ordinance and will evaluate surcharging in the future.

7. Page 13, Wastewater Treatment Plant Data Table - Line 3 states that Permitted SIU Flow for Local Limits (3.422 mgd) was used in the conversion of MAIL to mg/L. However, based on the local limits calculations presented in the Attachment, it appears that Total SIU + Other Non-SIU flows for Local Limits (3.442 mgd) was actually used for this conversion. EPA agrees that this latter flow value was appropriately used. Please correct the Table on p.13 to indicate this latter flow was the one used to convert MAIL to mg/L.

Response: Done.

8. Page 13, Wastewater Treatment Plant Data Table -The text below the table states, "The POTW flow for local limits reflects the actual POTW wastewater flow, including reuse flows, plus the average flow for Significant Industrial Users (SIUs)." Based on the calculations shown in the Attachment, it appears that the average POTW influent flow of 17.3 mgd was used as the POTW flow for local limits, without extra addition of average SIU flow. Please edit the sentence below the table to clarify which flows were used in the calculation.

Response: Reworded.

9. Page 19, Removal Efficiency Calculations -The removal efficiency for phosphorus should be corrected to 97.7%, the removal efficiency based on influent and effluent concentrations as indicated in the footnote (a) of the

table. The removal efficiency of 98.1% appears to be calculated from influent and effluent loadings, rather than from concentrations. Using the 97.7% removal efficiency results in a final MAHL of 1242 lb/day based on the 445A.199 State Existing Quality standard of 0.2 mg/L (Table of Applicable Standards for Local Limits Evaluation, Page 14) and MAIL of 584 lb/day (compared to 879 lb/day in the Table of Maximum Allowable Industrial Loading Calculations, Page 21). Similarly, the phosphorus value should be corrected in the Table of Daily Maximum Discharge Limits for Pollutants in Section G, Page 7.

Response: The calculations were done on an influent concentration of 8.6 mg/L and an effluent concentration averaging 0.16 mg/L. The data value in the table has been updated to show 0.16 mg/L rather than the rounded value of 0.2 mg/L. All Phosphorus data and local limits are correct as shown.

10. Page 19, Removal Efficiency Calculations -Please correct footnote (b) and remove zinc for the list of pollutants where default removal efficiencies were used.

Response: Done

11. Page 24, Influent Pollutant Table -Please clarify which TSS values are used. The table indicates that "TSS from POTW DMR Monitoring (used this data)," however, the average concentration from "TSS from additional POTW monitoring" is used to calculate the load referenced in the comments column of the table on Page 12.

Response: A calculated 80th percentile value of 580 mg/L was used. This data was calculated from the conventional pollutant data. The TSS has increased over time. This is correctly noted in the Influent Summary Table.

12. Page 25, Effluent Pollutant Table -Please clarify which ammonia values are used. The table indicates that "Ammonia from POTW DMR Monitoring (used this data)," however, the values from "Ammonia from additional POTW monitoring" are the values referenced in the comments column of the table on Page 10.

Response: Used the DMR Monitoring Data to be consistent. The change from 0.184 mg/L (from local limits monitoring) to 0.19 mg/L DMR monitoring did not result in any change in conclusions.